



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 2, 2012

By Facsimile

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Rc: United States v. Taylor
11 Cr. 310 (PGG)

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: July 2, 2012

Dear Judge Gardephe:

The Government, with consent of defense counsel, writes to respectfully request additional time to submit its sentencing submission and to also request a concomitant adjournment of the defendant's sentencing date. The Government's response to the sentencing submission letter is currently due today, July 2, 2012, and defendant's sentencing is currently scheduled for July 16, 2012.

The requested adjournment is to allow the Government to respond to defendant's substantive sentencing submission, which the Government received on June 26, 2012. In addition to numerous other legal arguments, the defendant has argued that one of his narcotics felony convictions does not count towards his status as a career offender under the Sentencing Guidelines. The Government requests the additional time in order to investigate the New York State charges that the defendant pled guilty to in order to properly assess the defendant's status as a career offender.

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I have spoken with Your Honor's Law Clerk who suggested that the Court might be available for sentencing on September 13, 2012 at 2:30 p.m. If the Court grants the Government's request, the Government also respectfully requests that its response to defendant's sentencing submission letter be due August 20, 2012, and that defendant's reply be due September 3, 2012.

Respectfully submitted,

PREET BHARARA
United States Attorney

By:

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cc: Joshua Dratel, Esq.